

EXHIBIT A

FILED: KINGS COUNTY CLERK 12/02/2020 03:55 PM

NYSCEF DOC. NO. 2

INDEX NO. 523224/2020

RECEIVED NYSCEF: 12/02/2020

Attorney(s) Silbowitz Garafola Silbowitz Schatz &
 Index # 523224/2020
 Purchased/Filed: November 20, 2020
 State of New York
 Court: Supreme
 County: Kings

**AFFIDAVIT OF SERVICE - SECRETARY OF STATE**

M.C. An Infant by Her Mother and Natural Guardian Ingrid Johanna Cardona

Plaintiff(s)

against

Target Corporation

Defendant(s)

STATE OF NEW YORK }
 COUNTY OF ALBANY } SS
 CITY OF ALBANY }

DESCRIPTION OF PERSON SERVED:

Approx. Age: 40 yrs

Weight: 200 lbs Height: 5' 0" Sex: Female Color of skin: White

Hair color: Black Other:

Robert Guyette, being duly sworn, deposes and says: deponent is over the age of eighteen (18) years; is not a party to this action, and resides in the State of NY, and that on November 24, 2020, at 12:35PM, at the office of the Secretary of State of the State of NY, located at 99 Washington Ave, 6th Fl, Albany, New York 12231 deponent served:
Summons & Verified Complaint

on

Target Corporation

the Defendant in this action, by delivering to and leaving with Colleen Banahan
 AUTHORIZED AGENT in the Office of the Secretary of State, of the State of New York, personally at the Office of the Secretary of State of the State of New York, two (2) true copies thereof and that at the time of making such service, deponent paid said Secretary of State a fee of \$40 dollars; That said service was made pursuant to Section BUSINESS CORPORATION LAW §306.

Deponent further says that deponent knew the person so served as aforesaid to be the agent in the Office of the Secretary of State of the State of New York, duly authorized to accept such service on behalf of said defendant.

Sworn to before me on this

24th day of November 2020

FAITH COZZI
 NOTARY PUBLIC, State of New York
 No. 01COB158874, Albany County
 Commission Expires Jan 8, 2023

Robert Guyette

Invoice-Work Order # 2036628
 Attorney File # 3999893

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INDEX NO. 523224/2020

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:

Date Purchased:

SUMMONS-----X
M.C., an Infant by her Mother and Natural Guardian,
INGRID JOHANNA CARDONAPlaintiff designates Kings
County as the place of trial.

Plaintiff(s),

The basis of venue is:
Plaintiff's residence

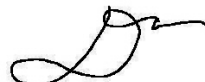
-against-

TARGET CORPORATION

Plaintiff resides at:
3208 Glenwood Drive
Apt. 3F
Brooklyn, NY 11210
County of KingsDefendant(s).
-----X**To the above named Defendants:**

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, NY
November 20, 2020



DAVID AMINOV
SILBOWITZ, GARAFOLA, SILBOWITZ,
SCHATZ & FREDERICK, LLP
ATTORNEY FOR PLAINTIFF(S)
INGRID JOHANNA CARDONA
MARIANA CARDONA
25 WEST 43RD STREET
SUITE 711
NEW YORK, NY 10036
(212) 354-6800
Our File No. 202001383

TO:
Target Corporation
Target Plaza
1000 Nicollet Mall
Minneapolis, MN 55403

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:

Date Purchased:

-----X
M.C., an Infant by her Mother and Natural Guardian, INGRID
JOHANNA CARDONA**VERIFIED
COMPLAINT**

Plaintiff(s),

-against-

TARGET CORPORATION

Defendant(s).
-----X

Plaintiffs by their attorneys, **SILBOWITZ, GARAFOLA, SILBOWITZ, SCHATZ & FREDERICK, LLP** complaining of the Defendants, respectfully alleges, upon information and belief:

1. That at all times herein mentioned, the Plaintiffs were, and still are residents of the County of Kings, State of New York.

2. That at all times herein mentioned, the Defendant **TARGET CORPORATION** was and still is a domestic corporation, duly organized and existing under and by virtue of the laws of the State of New York.

3. That at all times herein mentioned, the Defendant **TARGET CORPORATION** was and still is a foreign corporation duly authorized to do business in the State of New York.

4. That at all times herein mentioned, the Defendant **TARGET CORPORATION**, maintained a principal place of business in the County of Hennepin, State of Minnesota.

5. That at all times herein mentioned, the Defendant, **TARGET CORPORATION** owned the premises and appurtenances and fixtures thereto, located at 1598 Flatbush Avenue, County of Kings, State of New York.

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6. That at all times herein mentioned, and upon information and belief, the Defendant, **TARGET CORPORATION** managed the aforesaid premises.

7. That at all times herein mentioned, and upon information and belief, the Defendant, **TARGET CORPORATION** controlled the aforesaid premises.

8. That at all times herein mentioned, and upon information and belief, the Defendant, **TARGET CORPORATION** maintained the aforesaid premises.

9. That at all times herein mentioned, and upon information and belief, the Defendant, **TARGET CORPORATION** repaired the aforesaid premises.

10. That on or about December 21, 2019 infant Plaintiff **M.C.** was lawfully on the aforesaid premises.

11. That on or about December 21, 2019, while infant Plaintiff **M.C.** was lawfully about the aforesaid premises she was caused to fall and sustain serious and permanent injuries.

12. That on or about December 21, 2019, an attractive nuisance existed at the aforesaid premises.

13. The above mentioned occurrence, and the results thereof, were caused by the joint, several and concurrent negligence of the Defendants and/or said Defendants' agents, servants, employees and/or licensees in the ownership, operation, management, supervision, maintenance and control of the aforesaid premises.

14. That no negligence on the part of the Plaintiffs contributed to the occurrence alleged herein in any manner whatsoever.

15. That by reason of the foregoing, infant Plaintiff **M.C.** was caused to sustain serious injuries and to have suffered pain and suffering; that these injuries and their effects will be permanent; and as a result of said injuries, Plaintiff has been caused to incur, and will continue to

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incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

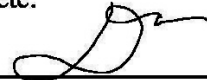
16. That, upon information and belief, Defendants had constructive and/or actual notice of this condition / attractive nuisance, and/or caused and created said condition / attractive nuisance.

17. That as a result of the foregoing, Plaintiffs were damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff(s) demand(s) judgment against the Defendants herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: New York, NY
November 20, 2020

Yours, etc.



DAVID AMINOV
SILBOWITZ, GARAFOLA, SILBOWITZ,
SCHATZ & FREDERICK, LLP
ATTORNEY FOR PLAINTIFF(S)
INGRID JOHANNA CARDONA
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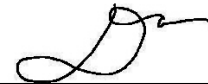
ATTORNEY'S VERIFICATION

DAVID AMINOV, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury:

I am an attorney at SILBOWITZ, GARAFOLA, SILBOWITZ, SCHATZ & FREDERICK, LLP, attorneys of record for Plaintiff(s), **M.C. AND INGRID JOHANNA CARDONA**. I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff(s) is/are not presently in the county wherein I maintain my offices.

DATED: New York, NY
November 20 2020



DAVID AMINOV